

UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA,
Plaintiff

v.

LEONARDO ALMONTE-RAMIREZ,
Defendant

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CASE NO.: 1:14-cr-00021-JL

ASSENTED TO MOTION TO CONTINUE

Now comes the Defendant in the above-captioned matter, Leonardo Almonte-Ramirez, by and through his attorney, William R. Sullivan, Jr., and hereby requests that this Honorable Court continue final pretrial hearing and jury trial in this matter now scheduled for August 21 and September 3, 2014, respectively. Defense counsel has spoken with the prosecutor in this matter, Assistant United States Attorney Nick Abramson, who has assented to this continuance.

As reasons for this request, defense counsel states that he was just retained in this matter and needs additional time to review the case prior to proceeding with trial. Defense counsel believes that a 45 to 60 day continuance would be sufficient for him to familiarize himself with the case and prepare for trial. Additionally, defense counsel is previously scheduled to be out of the office, and out of the area, during the week of August 18, 2014. As such, he will be unavailable to attend the final pretrial hearing on August 21, 2014.

Under the Speedy Trial Act, 18 U.S.C. 3161(h)(7)(A), the time requested in this motion is excludable as the interests of justice served by this requested continuance outweigh the Government's interests.

Wherefore, the Defendant respectfully requests that the final pretrial hearing and trial in this matter be continued from August 21 and September 3, 2014, respectively, to later dates convenient to the Court 45 to 60 days out.

Date: August 19, 2014

Respectfully submitted,
Defendant,
By his attorney,

/s/ William R. Sullivan, Jr.
William R. Sullivan, Jr.
SULLIVAN & SULLIVAN
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CERTIFICATE OF SERVICE

I, William R. Sullivan, Jr., do hereby certify that the above Assented to Motion to Continue has, on this 19th day of August, 2014, been served on all parties or their attorneys of record via electronic filing.

/s/ William R. Sullivan, Jr.
William R. Sullivan, Jr.